

STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION COLUMBIA ENVIRONMENTAL FIELD OFFICE

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January 20, 2016

Mr. Solomon Miller, Chief Manager-Administration Tennessee Valley Recycling, LLC P.O. Box 387 Pulaski, TN 38478

Re:

Compliance Evaluation Inspection Tennessee Valley Recycling, LLC NPDES Permit No. TN0080063 Pulaski, Giles County, Tennessee

Dear Mr. Miller:

On December 22, 2015, I conducted a Compliance Evaluation Inspection (CEI) of the storm water treatment system at the Tennessee Valley Recycling, LLC facility in Pulaski, TN. A CEI is conducted to determine compliance with the permit and to review the operation and maintenance of the treatment system. The following comments are for your consideration:

- 1. The current permit became effective on April 1, 2013 and shall expire on December 31, 2017.
- 2. This permit authorizes the discharge of treated storm water runoff from Outfall 001 to Richland Creek.
- 3. The following modifications have been made to the operating area since the previous inspection: (a) Tennessee Valley Recycling, LLC (TVR) has installed concrete paving on the majority of the operating area which drains to the storm water detention pond for solids removal and effluent filtration. (b) A storm water treatment system for the effluent sedimentation pond, consisting of pumps, controls, cartridge filters and Polychlorinated biphenyls (PCBs) removal filters was completed in the spring of 2014.
- 4. TVR has conducted additional monitoring for total PCBs in the mixing zone downstream of Outfall 001. This monitoring was performed during the fall of 2014 on a one-time basis to assess whether the waters of Richland Creek are affected by PCB sources, including current and past discharges from TVR. PCBs are lipophilic, or lipid-seeking which means they tend to associate with suspended organic particles and fatty tissues in organisms. For this reason, they tend to not be concentrated in water and are often not detectable in water samples using common analytical methods.

5. The study was conducted by employing instream monitors to assess bioaccumulation, known as SPMDs, or Semi-Permeable Membrane Devices. SPMDs are plastic sleeves filled with a lipid (fat) which serves as a collector for lipid-soluble substances such as PCBs. The SPMDs have a 4 week deployment period which allows them to detect chronic low levels of dissolved PCBs in stream water and outfall effluents. The division recognized that the SPMD's produce semi-quantitative results for dissolved PCBs only and do not characterize particulate bound PCBs. However, the study conducted focused on the potential for an ongoing source of PCBs to exist in the proximity of the TVR Outfall 001. The SPMDs were installed in the following locations:

SPMD #1- upstream at Hwy 64 overpass SPMD #2- in Outfall 001 mixing zone SPMD #3- in downstream mixing zone near Old Pulaski Bridge

Upon reviewing the stream study data and report submitted in May 2015, the division appreciates the effort that TVR and its consultant applied toward the study with the primary focus continuing to be the effluent data that TVR is providing, showing that PCB concentrations in the treated effluent discharge remain below detectable limits.

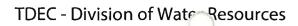
- 6. The monitoring frequency has been reduced from monthly to quarterly monitoring for Total Suspended Solids (TSS) and Polychlorinated Biphenyls (PCBs). Consent Order WPC12-0130 required temporary monthly monitoring of TSS and PCBs for two years or until 6 consecutive months of samples were in compliance with the permit limit. The sampling frequency was reduced starting with the April-June 2015 quarter.
- 7. The Storm Water Pollution Plan (SWPPP) has been developed and is being maintained pursuant to the requirements set forth in the Tennessee Multi-Sector General Permit for Industrial Activities, Sector N. The SWPPP has been reviewed and updated during the 2015 calendar year.
- 8. The annual report of detention pond maintenance for 2015 has not been submitted. It was discussed during the inspection and the report should be submitted in the spring of 2016. There have been scheduling conflicts with the cleaning of the pond as to the delay for submitting the report.

This concludes my inspection. I would like to thank Mr. Stewart Miller and Mr. Tant for their time and cooperation during the inspection. If you have any questions you may reach me at 1-931-840-4166 or by e-mail at gary.horne@tn.gov.

Sincerely.

Gary Horne

Division of Water Resources





ICIS NPDES Facilities Inspection Report

Facility Data														
NPDES II	IPDES ID: TN0080063 Facility Site N					ame Tennessee Valley Recycling								
Add				Addr	ress P.O. Box 387 Pulaski, TN 38478									
Permit E	ff. Date: Ap	r 1, 2013		Permit Exp D	ate:	Dec 31	, 2017			9	IC Code:			
Compliance Monitoring Information														
Complia	nce Monitor	ing Acti	vity Name	ompliance Eval	aluation (non-sampling) (CEI)									
			* If B	io Monitoring is	method ເ	ısed:								
Complia	nce Monitor	ing Acti	vity Ev	valuation										
	Compliance Monitoring Dates/Times													
Entry Date/Time (mm/dd/yyyy hh:mm): 12/22/2015 9:3						0 Exit Date/Time (mm/dd/yyyy hh:mm): 12/22/2015 11:00								
	Facility Representatives													
Mr. Stewart Miller, General Manager, 931-363-3593						Mr. Solomon Miller, Chief Manager, 256-3.						-353-6351		
On-Site Representative(s)Title, Phone Number						Responsible Official(s), Title, Phone Number								
		Tue y		St	atu	te and	Section Inf	formati	on					
Federal Statute: CWA - Clean Water Act					State Statute: Tennessee Water Quality Contr							trol Act		
Programs: NPDES- Base Program (Limits, Reporting, & Schedule)														
Co	mpliance l	Monitor	ring Reason:	Core Prograr	n				-					
Compliance Monitoring Agency Type: State					Agency Nar					me: TDEC - DWR				
Did EPA assist/ Inspection? No					Time Physically conducting activity: Days: Hours: 2									
Inspection Type: State				Compliance Monitoring Action Outco						: No Violation				
Lead Agency: State											Unrated	Inrated		
If Joint Ir	nspection, w	hat was		of the other part	_					VIII. 1911				
		100	Areas Eva	aluated Dur					hos	e areas e				
						Self - Compliance Program					Pretreatment			
Records / Records					Compliance Schedule						Pollution Prevention			
⊠ Fa	☑ Facility Site Review □				Labo	oratory	1				Storm Water			
⊠ Eff	☐ Effluent / Receiving Waters				Operations & Maintenance					Combined Sewer Overflow				
⊠ Flo	Flow Measurement				Sludge Handling / Disposal				Sanitary Sewer Overflow					
	San Sin o	TE Z		Co	mpl	liance	Monitoring	Summ	nary		THE PERSON			
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the					TDEC-DWR/ Columbia EFO/ 931-840-4166 1/20/16									
Inspectors Signature					Agency / Office / Phone Date									
Sherry M. Little					TDEC-DWR/ Columbia EFO /931-840-4153									
Manager's Signature						Agency / Office / Phone Date								

(Note: This form can only be printed to an XPS document, then saved for later use.)